June 3, 2011

Mr. Bill Wentworth
Waste and Chemicals Management Division (3WC23)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103

Mr. Thomas Bass
West Virginia Department of Environmental Protection
Office of Environmental Remediation
Office of Waste Management
601 57th Street, SE
Charleston, West Virginia 25304-2345

RE: Interim Measures Slurry Wall Installation
Response to Comments
Re: May 4, 2011 Submittal of Contractor Pre-Construction Deliverables
Solutia Site; 1 Monsanto Road, Nitro, West Virginia
EPA ID No. WVD039990965

Dear Bill and Tom:

Solutia Inc. (Solutia) submitted four Contractor Pre-Construction Deliverable reports by letter dated May 4, 2011. The following reports were enclosed for Agencies' review and comment:

- Operations Plan
- Health and Safety Plan
- Contingency Plan
- Storm Water Runoff and Water Management Plan

Solutia received Comments on the May 4 submittal from the West Virginia Department of Environmental Protection (WVDEP) and The United States Army Corps of Engineers (USACE) Huntington District via letter dated May 24, 2011, from Thomas L. Bass to William Wentworth; and May 23, 2011, from Lisa A. Humphreys to William Wentworth, respectively. On May 26, 2011, a conference call to discuss the Comments and to conduct clarification discussions was held. The call involved the WVDEP (Tom Bass and Don Martin); EPA (Bill Wentworth); Solutia (Mike House); Geo-Solutions Inc. (Ken Andromalos); and Potesta & Associates, Inc. (POTESTA) (Ron Potesta, Eli McCoy, Mike Light, and Mark Kiser). Results from this conference call are referenced in this Response to Comments.

Solutia looks forward to additional discussions to review this Response to Comments, with the objective of resolving all outstanding issues, planned for June 1 and June 2, 2011, at POTESTA's offices in Charleston, West Virginia.

If you have any questions regarding this submittal, please call me at (314) 674-6717, or I can be reached via e-mail at mlhous1@solutia.com.

Sincerely,

Michael L. House
Manager, Remedial Projects
Solutia Inc.

MLH:DML/mh

Attachments

c: Jason T. Smithson – USACE
Ken Andromalos – GeoSolutions
Don Martin - WVDEP
Lisa Humphreys - USACE
Ron Potesta, Mike Light, Chris Grose, Mark Kiser – POTESTA

WVDEP/DLR Comments

Comment 1: *Operations Plan tab, first page: The significance of this page is unclear. Please include a discussion establishing a frame work for the information as well as a table of contents identifying the referenced submittals location in the document.*

Response 1: The submittal of the four separate documents has been restructured to provide more clarity and ease of use. The Operations Plan, Contingency Plan, HASP, and Storm Water Management Plan will be submitted as separate, standalone documents. Note that that previously titled "Storm Water Runoff and Water Management Plan" has been changed to "Storm Water Management Plan" to more accurately reflect its purpose to control both run-on and run-off storm water relative to the work areas.

Comment 2: *Technical Submittal, page 6. Section 6: The last paragraph is in error. "The Stormwater Runoff and Water Management Plan" was submitted under the same cover.*

Response 2: See Response 1.

Comment 3: *Technical Submittal, Item No. 1a, page 2: The introduction paragraph references drawings not included as a component of this document. Specifically drawing Nos. 4, 13, 14, and 15 cannot be found. Please provide the drawings.*

Response 3: See Response 1. The drawings referenced are from the design package and are provided with the Storm Water Management Plan.

Comment 4: *Attachment D — SB Slurry Wall Installation Plan, page 5 of 9: The second paragraph of' section IV Trench Excavation "The slurry wall will be excavated from the work platform and on the proposed alignment, as shown on the drawings, with the exception of the modified cord along the PDA wall alignment." First, the term drawings fail to identify what draws and where they are located. Second, define the modified cord.*

Response 4: The cited section has been changed to address the comment.

Comment 5: *Attachment D – Slurry Wall Installation Plan, page 6 of 9, Section C Demobilization: Clarify the statement "The slurry walls will be capped as specified." Where are the specifications?*

Response 5: Additional clarification has been provided.

Comment 6: *Standard Operating Procedure SB Slurry Trench - Quality Control, page 7, Section 4,4 Slurry Trenching: Line item two states "The level of bentonite slurry shall always be maintained at least two (2) feet above the groundwater table and shall not be permitted to drop more than three (3) feet below the surface of the*

working platform. Test slurry in trench (see Test Methods)." A review of section 5 page 10, Test Methods, refers the reviewer to Slurry Trench Quality control Form, Appendix A. Appendix A does not appear to be part of this document: please provide.

Response 6: References to Appendix A have been deleted. The referenced documents have been provided in the Operations Plan as Attachment D - SB Slurry Wall Installation Plan (see last 4 pages of Attachment D).

Comment 7: *Standard Operating Procedure SB Slurry Trench - Quality Control, page 7, Section 4.5.1. The sixth bullet: The bullet should be removed from this document.*

Response 7: The requested change has been made.

Comment 8: *Standard Operating Procedure SB Slurry Trench - Quality Control, page 10. Section 4.7 Backfill Placement: Please expand upon the note under line item 5. What is proper maintenance?*

Response 8: "Proper Maintenance" has been further defined.

Comment 9: *Standard Operating Procedure SB Slurry Trench - Quality Control, page 10, Section 5.0 Test Methods: See comment 5.*

Response 9: References to Appendix A have been deleted. The referenced documents have been provided in the Operations Plan as Attachment D - SB Slurry Wall Installation Plan (see last 4 pages of Attachment D).

Comment 10: *Standard Operating Procedure SB Slurry Trench - Quality Control, page 12, Section 5.3.2 Frequency: At the end of the final bullet there is 5.4, not to be misconstrued with the next section. The reviewer believes it to be a typo. If not please explain.*

Response 10: The typo has been corrected.

Comment 11: *Standard Operating Procedure SR Slurry Trench - Quality Control, page 13. Section 5.6 Moisture Content: The first bullet has an extra space in the middle of the sentence.*

Response 11: The extra space has been deleted.

Comment 12: *Standard Operating Procedure SB Slurry Trench - Quality Control, page 13, Section 5.7.1 Procedure: Item 6 has an extra space.*

Response 12: The extra space has been deleted.

Comment 13: *Standard Operating Procedure SB Slurry Trench — Quality Control, page 13. Section 5.8 API Quick Permeability: At the end of the final bullet there is 5.8.1, not to be misconstrued with the next section. The reviewer believes it to be a typo. If not please explain.*

Response 13: The typo has been corrected.

Comment 14: *Standard Operating Procedure SB Slurry Trench - Quality Control, page 13 and 14, Sections 5.6, 5.7 and 5.9 reference Appendix C. The Appendices appear to be missing from this document. Please correct.*

Response 14: References to Appendix C have been deleted.

Comment 15: *Item No 2 - Health and Safety Plan, Page 7-1, Section 7.2 Instrument Calibration: It is unclear if the manufacturer recommendation is for daily calibration or a more stringent calibration requirement is being adopted. At a minimum the manufacturer recommendation for calibration arid usage should be met as we1l as identified.*

Response 15: The manufacturer's recommendations for calibration have been provided and will be followed.

Comment 16: *Item No. 2 - Health and Safety Plan, Page 7-1, Section 7.3 Use of Detector Tubes: Given the numerous volatile compounds associated with the site it is unclear why Benzene has been chosen as the predominate volatile compound to monitor. A quick scan of contaminates contained within groundwater identify greater concentration of Carbon tetrachloride, Vinyl chloride. Trichloroethane. Tertrachloroethane, etc. Please provide the rationale for targeting Benzene.*

Response 16: Additional rationale provided in Section 7.3 Use of Detector Tubes.

Comment 17: *Item No. 2 - Health and Safety Plan, Page 7-2, Section 7.5 Real-Time Monitoring Dust: The perimeter monitoring plan needs to provide additional detail. The scope of work covers three distinct areas of the site with varying obstacles. Please provide a figure identifying the physical locations of the monitoring point to be established per area.*

Response 17: A standalone Perimeter Air Monitoring Plan has been developed detailing the protocols for monitoring, evaluation of results and responding to air monitoring results.

Comment 18: *Item No. 2 – Health and Safety Plan, Page 8-1, Section 8.0 Material Handling and Decontamination: The reviewer could not find a process description for decontaminating a respirator or SCBA if required. Include the process.*

Response 18: The requested respirator decontamination process has been provided in Section 8.1.1 under paragraph Level B Decontamination.

Comment 19: *Item No. 2 - Health and Safety Plan, Page 8-2, Section 8.1.2 Equipment Decontamination: Decontamination water shall be properly managed. characterized, treated, and/or disposed of. Please provide construction detai1(s) for a decontamination pad/area indicating materials to he utilized, collection method of decontamination water, and management of waste to be collected.*

Response 19: Per discussions in the conference call held on Thursday, May 26, 2011, the water used to remove soils from equipment in preparation for relocation from one work area to another will be directed back into the original work area and managed along with the other excess water within that work area.

Comment 20: *Item No. 5 - Stormwater Runoff and Water Management Plan, Page 1, Introduction: The introduction should include Run-on. "This Stormwater Runoff/Run-on and Water management Plan ..."*

Response 20: See Response 1.

Comment 21: *Item No. 5 – Stormwater Runoff and Water Management Plan, Page 1, Referenced Drawings: The drawings identified were not submitted with this document. Please provide.*

Response 21: See Response 1. The identified drawings have been provided in the Storm Water Management Plan.

Comment 22: *Item No. 5 – Stormwater Runoff and Water Management Plan, Page 2, Existing Conditions: Drawings J, I, and H were not submitted. Please submit the missing drawings.*

Response 22: See Response 1. The pertinent subject drawings have been provided. The use of letters to identify the drawings has been removed to avoid confusion.

Comment 23: *Item No. 5 - Stormwater Runoff and Water Management Plan, Page 2, Existing Conditions: The fourth paragraph discusses utilization of existing stormwater controls. It is unclear to the reviewer if there is a clear understanding of the conditions of subsurface. Give the chemical load within subsurface soils and sequentially groundwater, the soil waste generated may contain hazardous substance/waste. Therefore, all process water will require properly management. characterization, treatment, and or disposal. This document fails to adequately convey appropriate management. Please clarify.*

Response 23: In the May 26, 2011, conference call between WVDEP (Tom Bass and Don Martin); USEPA (Bill Wentworth); Solutia (Mike House); Geo-Solutions (Ken Andromalos); and POTESTA (Ron Potesta, Eli McCoy, Mike Light, and Mark

Kiser); Ken Andromalos more thoroughly explained how water from various sources would be managed during the slurry wall installation operation. The source of water included: saturated soils; precipitation events; soil-bentonite slurry make-up; and equipment washing before relocation from one work area to another. Ken's discussion is summarized below:

> Geo-Solutions' Storm Water Management Plan addresses the management of all groundwater and storm water encountered and contained within each bermed area of disturbance (areas within each slurry wall alignment). This plan also manages all impacted site soils within these same bermed/contained areas.
>
> The slurry trench method of excavation significantly minimizes the amount of groundwater/storm water that needs to be managed within each contained area. This method involves the excavation of the trench while the trench is maintained full of bentonite slurry at a level above the surrounding groundwater table. The bentonite slurry itself is prepared from non-impacted water. This method prevents groundwater from infiltrating into the trench excavation (the bentonite slurry maintains a positive hydraulic pressure outward from the excavation). The only affected groundwater that is encountered is that which is contained within the pores of the excavated material. This material when brought to the ground surface is then blended with additional bentonite slurry and dry bentonite and subsequently used as backfill in the slurry trench to create the final in-place underground barrier wall. This process significantly minimizes any "free" groundwater from requiring management.
>
> Non-contact storm water outside the bermed areas is allowed to take its normal course in accordance with current storm water management practices at the site. The non-contact storm water which falls within the outside perimeter of the bermed areas will be subject to additional filtration through the additional silt and super silt fences installed around each perimeter of the bermed areas.
>
> This leaves the only storm water to require management as that which falls directly within the bermed areas. This water will be allowed to pond within the low-lying areas of each bermed area. During regular intervals and after a rain event, this water will then be pumped into newly constructed interior sediment basins.
>
> The runoff produced inside the slurry wall limits of the PA and PDA will be conveyed to the sediment basins installed within the slurry wall limits. Once water passes through the basin it will be transported (pumped) to the slurry wall's perimeter silt fence. The topography will then direct storm water runoff into the constructed storm water channel leading to Outfall 001, discharging into the Kanawha River. The monitoring program for all

discharge water will be in accordance with permit requirements. The frequency of such monitoring may be increased based on modifications to this permit. Runoff produced inside the slurry wall limits of the WTA will be conveyed to sediment basins installed within the slurry wall limits. This water will then be pumped along the interior of the two perimeter silt fences. In this area, the existing vegetation, the silt fence. and super silt fence will further filter the storm water.

Following those more detailed discussions and information exchanges, it is Solutia's understanding that an agreement was reached among all parties that Geo-Solutions' plans for management of the resultant surface water was appropriate. It was further agreed that the surface water being managed by Geo-Solutions within the work zones was appropriate; and that the Site NPDES Permit is the appropriate regulatory vehicle for management of the much smaller quantities of water that might be required to traverse the work zone boundary onto the Site.

The parties agreed that the existing Site NPDES Permit would likely need to be modified to accommodate the slurry wall installation, pursuant to Solutia's NPDES Permit Modification Request dated April 18, 2011, as supplemented by the following two documents: 1) Report titled Supplemental Information for Request for Permit Modification, addressed to Mr. Scott Mandirola, dated May 13, 2011, and: 2) Letter report to Mr. Yogesh Patel, dated May 13, 2011, Re: Groundwater Constituent Loading Calculations to the Kanawha River.

Comment 24: *Item No.5 - Stormwater Runoff and Water Management Plan, Page 4, Section 6.1 Sequence of Construction Activities: The sequence identifies the installation of silt fence however, on page 6 of the Technical Submittal "GSI will build diversion berms…" Please explain the discrepancy.*

Response 24: The following has been added to the paragraph: "Diversion berms will be utilized to direct potentially affected water and slurry from the slurry trench operations towards the interior of each slurry wall area to be properly managed in accordance with this SWMP."

Comment 25: *Item No. 5 - Stormwater Runoff and Water Management Plan, Page 5, Section 6.2 Construction Activity Description: The fourth paragraph states "...15 to 20 percent of the excavated material will remain at completion of the project. At completion of all of backfill operations for each slurry wall, the remaining excess soils and bentonite slurry will be placed within the slurry wall limits and used to fill surface depressions." The excess material may be hazardous substance/waste and should be managed appropriately.*

Provide specifications and details for the "rain cover".

Response 25: The "rain cover" (dirt glue, clay cap, etc.) specification details were provided in the Supplemental Information for Request for Permit Modifications, dated May 13, 2011, addressed to Mr. Scott Mandirola. A copy of that document is provided with this document.

Comment 26: *Item No. 5 - Stormwater Runoff and Water Management Plan, Page 10, Section 7.8 Element #8: Control Other Pollutants: The statement "This section refers to additional controls related to construction activity at the Project." In handling groundwater and soil there will be pollutants; how are they to be controlled? The statement provided in section 7.8 does not provide adequate information to provide the reviewer a comfort level that these pollutants will be properly managed.*

Response 26: Response 23 addresses the first question under this comment. Clarifying language has been added under Section 7.8. Note that the 7.8 subsections detail the management practices for each pollutant.

US Army Corps of Engineers Comments

Comment 1: *Operations Plan – 4th page in document by Geo-Solutions. Where are the technical submittal items?*

Response 1: Appendix F of Solutia's Request for Proposal (RFP) included a technical submittal register for the Soil-Bentonite Slurry Wall Installation Project. The technical submittal register required 23 items to be submitted by the contractor (Geo-Solutions, Inc.) for approval or information. Included in these 23 items were:

Item No 1 – Operations Plan
Item No. 2 – Health and Safety Plan (HASP)
Item No. 3 – Contingency Plan
Item No. 5 – Storm Water Management Plan (SWMP)

The above items were to be the technical submittal items to be provided to the regulatory agencies for review based on discussions during a December 1, 2010, meeting attended by Solutia, POTESTA, West Virginia Department of Environmental Protection (WVDEP), and United States Environmental Protection Agency (USEPA). The items provided to the regulatory agencies on May 4, 2011, included the above items (Item Nos. 1, 2, 3, and 5) along with the additional items listed below:

Item No. 4 – Construction Schedule
Item No. 13 – Slurry Wall Installation Plan
Item No. 14 – Quality Control Plan
Item No. 15 – Bar Chart Schedule and Sequence of Operations

The information reviewed by the regulatory agencies constituted the agreed upon technical submittal items.

Comment 2: *Operations Plan - Page 4, 3-B, Decon. Decon water should be captured on a properly constructed decon. Pad, captured, and disposed of properly.*

Response 2: Decontamination will take place within the slurry wall alignment so that material removed from equipment (soil and water) will stay within the boundary of the slurry wall. This approach is consistent with the construction of the soil-bentonite slurry walls in that soils and groundwater excavated from the trench will be placed on the inside of the slurry wall. Also refer to the response to WVDEP Comment No. 23.

Comment 3: *Operations Plan - Page 6, Section 6.0, 1st set of bullets, 2nd bullet. Won't GW be encountered during slurry wall installation?*

Response 3: Groundwater will be encountered during slurry wall installation. The second bullet item "Excess water generated during slurry trenching" includes both groundwater and slurry. A relatively small volume of groundwater included in the excavated soil matrix will be removed from the trench. Groundwater will not be pumped from the trench. The text has been revised to elaborate on the presence of groundwater.

Comment 4: *Operations Plan - Page 6, Section 6.0, 5th bullet. Where is the sed. and erosion control plan?*

Response 4: The Stormwater Runoff and Water Management Plan (subsequently retitled the "Storm Water Management Plan") was included in the documents provided to the regulatory agencies on May 4, 2011. This document described the procedures, controls, and best management practices including sediment and erosion control measures to be implemented as part of the project. The SWMP has also been revised in response to regulatory agency review comments.

Solutia developed and submitted to the regulatory agencies on May 13, 2011, a document entitled "Supplemental Information for Request for Permit Modification for WV/NPDES Permit No. WV0113181" which describes existing surface runoff controls at the project site and presents additional information on how surface runoff will be handled during and following installation of the soil-bentonite slurry walls. This document will now be considered as part of the retitled Storm Water Management Plan.

Comment 5: *Operations Plan - Page 6, Section 6.0, last sentence. The Stormwater plan appears to be in this document. Not under separate cover. Is there another one?*

Response 5: No, there is not another stormwater plan. The Stormwater Runoff and Water Management Plan was included in the document provided to the agencies on May 4, 2011. See the response to Comment No. 4 above for additional discussion.

Comment 6: *Operations Plan - Page 9, other QC. Where is WVDOH manual referenced?*

Response 6: The technical specifications developed for the project include references to the WVDOH Standard Specifications for Roads and Bridges for both materials and construction methods for various parts of the project. These specifications are available for viewing or downloading from WVDOH's website. The WVDOH specifications were not reproduced in the project documents.

Comment 7: *Operations Plan for the HUB Park Pipe - Page 2, Introduction. Is the 42" pipe sufficient? Where are the calcs?*

Response 7: The HUB Park Pipe is being installed by the slurry wall contractor as part of the project but is not part of the RCRA Interim Measures. The western end of the adjacent HUB Industrial Park suffers from inadequate surface runoff drainage. A review of historical documents indicates that the industrial park was not developed with a dedicated outlet to the Kanawha River. The lack of an outlet has lead to flooding concerns within the industrial park. The landowners in the HUB Industrial Park approached Solutia for assistance in mitigating their drainage problem. Solutia agreed to assist in the installation of a culvert. Solutia has worked with the landowners to implement a solution (the 42-inch pipe) that was a practical, cost effective solution to the industrial park's drainage problems. The analysis of the proposed culvert is attached.

Comment 8: *Plan for the HUB Park Pipe - Page 2, Related Submittals. Where is Item 23?*

Response 8: Item No. 23 – HUB Park Drain Pipe Materials was intended to be reviewed by the owner (Solutia) for verification of conformance with the technical specifications. This technical submittal was not on the list of submittals to be provided to the regulatory agencies. Refer to Comment 1 for the list of technical submittals that were submitted to the regulatory agencies.

Comment 9: *Plan for the HUB Park Pipe - Figure 1. What is stable slope mm/max?*

Response 9: The maximum stable slope for the drain pipe excavation will be determined in the field based on the existing soil conditions.

Comment 10: *Plan for the HUB Park Pipe - Attachment D - Slurry Wall Installation Plan, Page 3. Will the slurry pond be lined?*

Response 10: The bentonite slurry pond will not be lined. There is no need for lining the pond based on its intended use. The bentonite slurry will form its own "liner" on the inside surface of the pond.

Comment 11: *Stormwater Plan - Page 1, Section 1.0, 3rd bullet. Conduct E&S inspections daily.*

Response 11: Erosion and sediment control measures will be inspected daily during construction. The SWMP will be revised to require daily inspections.

Comment 12: *Stormwater Plan - Page 1, Section 2.0. Reference the separate cover. Really all documents should be included in this document so it is standalone.*

Response 12: The referenced drawings have been included as attachments to the SWMP. Drawings are contained in Appendix D of the SWMP.

Comment 13: *Stormwater Plan - Page 2, Section 3.0. Where is drawing A? Is this drawing 2 in the Draft technical specs? Why did it change to A now? Isn't this confusing?*

Response 13: Drawing A referenced in the original plan is the same as Drawing 2 of the construction specifications. Drawing No. 2 is attached in Appendix D of the SWMP as described in the Response No. 12 above.

Comment 14: *Stormwater Plan - Page 3, Section 4.3. Correct the spelling of Putnam.*

Response 14: The spelling of Putnam has been corrected.

Comment 15: *Stormwater Plan - Page 7, Section 6.2.2. Are there drainage calcs for the 42" pipe?*

Response 15: Refer to the response for Item No. 7.

Comment 16: *Stormwater Plan - Page 7, Section 6.2.2. What is considered unsuitable material?*

Response 16: Unsuitable material will be soil excavated that is not suitable for incorporation in the 42-inch pipe backfill. This could be debris, visually affected materials, or soil determined by POTESTA as unsuitable for completed soil backfill.

Comment 17: *Stormwater Plan - Page 7, Section 6.2.2. Where are onsite and offsite borrow areas and what types of soil?*

Response 17: Onsite borrow may be obtained from the onsite borrow areas. Onsite soil borrow areas are shown on Figures 1 and 2 included with the "Supplemental Information for Request for Permit Modification for WV/NPDES Permit No. WV0116181. This document was submitted to the regulatory agencies on May 13, 2011. Onsite soil borrow areas include clean soil stockpiled at the former fire water bladder

area in the Process Area, and clean soil at the former storm water tank area in the Process Area. In addition, an onsite soil borrow area has been designated at the Waste Treatment Area in an area not impacted by historical manufacturing operations.

Offsite soil borrow will be procured from a commercial source consisting of a forested area near Pocatalico, West Virginia.

Comment 18: *Stormwater Plan - Page 7, Section 6.2.2. Will the slurry pond be lined?*

Response 18: The slurry pond will not be lined. See the response for Item No. 10.

Comment 19: *Stormwater Plan - Page 7, Section 6.2.2. Testing of borrow area material?*

Response 19: The offsite soil borrow area was sampled to ensure that soil brought to the site will be clean and free of contaminants. Analysis results showed that the soil from the offsite commercial source is clean.

Comment 20: *Stormwater Plan - Page 9, Section 7.1. Monitoring program for discharge water.*

Response 20: The site's WV/NPDES permit covering the work areas includes storm water runoff monitoring requirements. Solutia will comply with terms of the WV/NPDES permit including storm water runoff sampling, analysis, and reporting.

Comment 21: *General Comment - Suggest placing all attachments in one place and tab them appropriately.*

Response 21: The document will be revised, and resubmitted in accordance with the comments and responses. The individual reports will be organized with tabs to make the document more user friendly.

Comment 22: *General Comment - Tab Sections.*

Response 22: See response for Item 21 above.

Comment 23: *General Comment - Include a site description/history at the beginning of the document.*

Response 23: A site description and history was presented to the USEPA and the WVDEP in the Interim Measures Work Plan dated November 3, 2009. Solutia will provide a copy of the site history upon request.

Comment 24: *General Comment - Include acronym definition page.*

Response 24: Acronyms have been defined at their first use in each report.

Comment 25: *Page 2-4. After "Cell phones" add "numbers."*

Response 25: The work "numbers" has been added after "cell phones."

Comment 26: *Page 3-4, Paragraph 3.3.4, last sentence. The agency is the National Institute for Occupational Safety and Health (NIOSH).*

Response 26: The reference to the National Institute for Occupational Safety and Health (NIOSH) has been corrected.

Comment 27: *Page 3-5, Paragraph 3.5. Confined space procedures must be in accordance with 29 CFR 191 0.146.*

Response 27: The reference to 29 CFR 1910.146 has been inserted in the text.

Comment 28: *Page 3.6. In all of the bullets at the top of this page, change "should" to "shall."*

Response 28: The use of the word "should" has been used versus "shall" since the bullet points are recommendations and not required by rule or regulation.

Comment 29: *Page 3-8. Both DEET and permethrin are organic chemicals and should not be used when sampling for VOCs or SVOCs.*

Response 29: The use of repellants containing DEET or permethrin should not result in issues with work space air monitoring for VOCs or SVOCs. See clarification to the text in Section 3.8 of the HASP.

Comment 30: *Page 3-9, Paragraph on Wasps. There are two instances where "of" needs to be changed to "or." In the paragraph on snakes, suction is not recommended anymore in the treatment of snake bites.*

Response 30: The text has been corrected as suggested.

Comment 31: *Page 4-1, Paragraph 4.1. At the end of the bullet list, add "Other specific tests as needed (e.g., blood lead levels if exposed to lead)."*

Response 31: The text has been revised to add the suggested text.

Comment 32: *Page 5.1, Paragraph 5.3. In the second to last sentence, change "should" to "shall."*

Response 32: The use of "should" has been used versus "shall" since this is a recommended practice and not required by regulation.

Comment 33: *Page 5-2, Paragraph 5.5. In the second to last bullet, change "should" to "shall."*

Response 33: The use of "should" has been used versus "shall" since this is a recommended practice and not required by regulation.

Comment 34: *Page 5-3, Paragraph on excavations. In the second sentence, remove "these items."*

Response 34: The text has been revised consistent with the comment.

Comment 35: *Page 5-5. Third to last bullet, last sentence, change "reasonable" to "reasonably."*

Response 35: The suggested revision to the text has been made.

Comment 36: *Page 5-7. Bullet at top of page, last sentence, after "not" add "in use."*

Response 36: The suggested revision to the text has been made.

Comment 37: *Page 6-1, Paragraph 6.1. There is no such thing as "modified Level D." Coveralls and overboots are considered as Level D.*

Response 37: Modified Level D is often used in the industry to designate Level D PPE upgraded to provide enhanced protection, usually to prevent skin contact. The reference to Modified Level D has been removed and regular or polycoated Tyvek (or similar material), nitrile gloves, and nitrile or other chemically resistant overboots may be worn when Level D work is conducted..

Comment 38: *Page 6-2. Last paragraph on page, second sentence, add "full-face" before "respirators."*

Response 38: The suggested revision to the text has been made.

Comment 39: *Page 8-2, Level B Decontamination. The SCBA back pack has to be removed before the Tyvek® suit can be removed.*

Response 39: The suggested revision to the text has been made.

Comment 40: *Page 8-2, Paragraph 8.1.2. Water used for decontamination must be treated as Investigation Derived Waste (I DW).*

Response 40: Refer to the response to WVDEP Comment No. 23.

Comment 41: *Page 9-2, Paragraph 9.2. Are project field personnel trained in first aid and CPR?*

Response 41: At least one onsite person will be trained in first aid and CPR.

Comment 42: *Page 10-1, Paragraph 10.1. Training must also include 24-hour site-specific training.*

Response 42: Twenty-four hour site specific training will be performed under the supervision of a qualified site supervisor. This language has been inserted into the text.